## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

No. 18 CR 789

v.

Judge Gary Feinerman

DENY MITROVICH

## GOVERNMENT'S MOTION FOR EXTENSION OF TIME TO SUBMIT RESTITUTION INFORMATION

The UNITED STATES OF AMERICA, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, respectfully moves to extend the deadline for submission of restitution information by 21 days, and in support thereof states the following:

- 1. On March 2, 2022, defendant pled guilty to one count of possessing child pornography, in violation of 18 U.S.C. 2252A(a)(5)(B). The Court set a sentencing date of July 21, 2022.
- 2. Under 18 U.S.C. 3664(d)(1), today is the deadline for submission of restitution requests in this matter.
- 3. The government has received a number of restitution requests in this case. However, in order to facilitate appropriate resolution of those requests, it is necessary for the government to determine the quantity and type of media possessed by the defendant that involved the victims who have made requests, as well as to determine whether the defendant shared any media involving the victims.

4. The case agent is currently in the process of working on this analysis and believes the work should be complete this week. The government will then require some additional time to communicate with counsel for the victims about the

5. As such, the government requests that the deadline for its submission of the required information be extended by 21 days in order to allow for the work described above to be completed.

Dated: May 22, 2022 Respectfully Submitted,

results of this analysis.

JOHN R. LAUSCH, JR. United States Attorney

By: <u>/s/ Andrew C. Erskine</u>

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